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BEFORE THE

FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C. 20554

In the Matter of=20=20=20=20=20=20=20=20=20=20=20=20=20=20=20=20=20
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Amendment of Part 90 of the Commission Rules) WP Docket No.
07-100

COMMENTS OF THE DuPage Public Safety Communications - DU-COMM

I. INTRODUCTION

DuPage Public Safety Communications provide these comments regarding the

above captioned matters addressed in the Notice of Proposed Rulemaking, FCC 07-85, adopted by the Commission on May 9, 2007.

II. SUMMARY OF COMMENTS

N/A

III. DISCUSSION

DU-COMM is a consolidated 911 center in DuPage County Illinois, in the suburban Chicago region. DU-COMM provides Public Safety Communications for twenty-seven (27) agencies, including Police, fire and EMS, including MABAS Division 12, a mutual aid system for fire departments. As part of DU-COMM's daily business we routinely use voice and paging on VHF public safety frequencies.

Paragraph 4.

DU-COMM and its agencies as well as the majority of fire service in Illinois have a long history of using paging on the voice channels. This is done for alerting primary responding units, alerting auto and mutual aid units, alerting on duty personnel to return from various duty related non-emergent assignments, alerting off duty personnel to respond, and making announcements of interest to surrounding departments or personnel. Eliminating or restricting the use of paging on the voice channels would be detrimental to the fire service in Illinois. The FCC acknowledges that "paging and voice operations can generally co-exist on

the same channel in the same area, provided the paging transmissions are infrequent (low traffic volume) and the paging licensee monitors the channel prior to transmitting."

Paragraph 5.

Paging on mutual aid frequencies in Illinois is critically important. The Illinois Fire Service has a state-wide fire mutual aid system that uses a common frequency (154.265 MHz) which uses radio frequency paging for notification of alarm activation and units due to respond. The system called the Mutual Aid Box Alarm System (MABAS) is recognized as a model for fire service mutual aid and is being copied by other states to facilitate the sharing of resources for fire and rescue emergencies. The elimination or restriction of paging on the mutual aid frequencies would severely impact this operation across the state.

Paragraph 6.

The fire service in Illinois has a long history of using paging on the voice channels. This is done for alerting primary responding units, alerting auto and mutual aid units, alerting on duty personnel to return from various duty related non-emergent assignments, alerting off duty personnel to respond, and making announcements of interest to surrounding departments or personnel. Eliminating or restricting the use of paging on the voice channels would be detrimental to the fire service in Illinois. In a majority of cases the paging is used by a large portion of the volunteer departments that would find it financially impossible to implement other more costly commercial based systems that are less effective for alerting their members. The increased cost of commercial systems would also impact the smaller full time departments that use RF paging.

IV. CONCLUSION

It is the position of DU-COMM that paging should be allowed to continue to coexist with voice on VHF Public Safety frequencies. Any change in the current policy on our frequencies would dramatically interfere with our current operations and our critical public safety communications.

Respectfully Submitted,

Brian Tegtmeyer

Brian Tegtmeyer, ENP

Executive Director, DU-COMM

DuPage Public Safety

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